

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA.

CASE NO: 00-6309-~~CF~~ SEITZ

UNITED STATES OF AMERICA,

CR

Plaintiff,

-vs-

JULIUS BRUCE CHIUSANO,

Defendant.

MOTION FOR PERMISSION TO TRAVEL

COMES NOW, the Defendant, JULIUS BRUCE CHIUSANO, by and through undersigned counsel and pursuant to the Federal Rules of Criminal Procedure, and respectfully requests this Honorable Court enter an Order permitting the Defendant to leave the State of Florida and travel to San Juan, Puerto Rico, and as grounds, would show unto the Court the following;

1. That the Defendant, JULIUS BRUCE CHIUSANO, is presently released on a one hundred thousand dollar corporate surety bond with supervised release.
2. That the Defendant is also released on bond on a one hundred thousand dollar corporate surety bond in Case No. 00-6273-Cr-Huck.
3. That the Defendant has been on supervised release since October 5, 2000.
4. That the Defendant respectfully requests this Honorable Court permit the Defendant to travel to San Juan, Puerto Rico, for the purpose of President's Day Weekend Holiday.
5. That the Defendant desires to travel outside of the State of Florida for approximately Four (4) days beginning on or about February 15, 2001 and returning February 19, 2001.
6. That a copy of the Defendant's Itinerary is attached hereto as Defendant's Exhibit 1.
7. That undersigned has spoken to the Pretrial Services officer, Raul Sagaro, regarding this travel permit and he has no objection.

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8. That prior to the Defendant's departure the Defendant will provide addresses and telephone numbers where he will be staying to Rauol Segaro of the Pretrial Services Office in Dade County, Florida, as required under Defendant's terms and conditions of supervised release and report immediately upon his return to the jurisdiction.

WHEREFORE, by reason of the foregoing, the Defendant, JULIUS BRUCE CHIUSANO, respectfully requests this Honorable Court enter an Order granting the Defendant's request permitting the Defendant to travel outside the State of Florida and to San Juan, Puerto Rico.

10-G CERTIFICATE

That undersigned counsel, pursuant to Local Rule 10(G)(1) certifies that he has contacted the opposing counsel, Assistant United States Attorney, Jeffrey Sloman on behalf of Brian McCormick, of the Southern District of Florida in an effort of good faith to resolve by agreement the subject matter and he states that he has no objection to the granting of this motion.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to Jeffrey Sloman on behalf of Brian McCormick, Assistant United States Attorney, United States Attorney's Office, 299 East Broward Boulevard, Fort Lauderdale, FL 33301, by Facsimile (954-356-7230) and Raul Sagaro, Pretrial Services, 330 Biscayne Blvd., Suite 500, Miami, FL 33132, by Facsimile 305-530-7123, and by U.S. Mail, and the original hereof filed with the Clerk of the Court, by Hand Delivery, this 9th FEBRUARY, 2001.

Respectfully submitted,

DONALD R. SPADARO, P.A.
Attorneys for DEFENDANT/CHIUSANO
1000 South Federal Highway
Suite 103
Fort Lauderdale, Florida 33316
Telephone: (954) 763-5504

By: 

DONALD R. SPADARO, ESQUIRE
Florida Bar No. 320341

LIBERTY TRAVEL

Loehmann's Fashion Island Mall

18797 Biscayne Boulevard

Aventura, Florida 33180

Telephone (305) 705-0185 Fax (305) 705-0965

Email: mazena@libertytravel.com

787-
253- 1700

To: Brenda

From: Audra Mazen

Re: Bruce Chiusano

Dt: 1/30/01

No of Pages: 1

Ritz-Carlton
San Juan
P.R.

Brenda,

Attached please find a copy of a flight itinerary for Bruce Chiusano. Bruce would like to travel to the Ritz Carlton in San Juan February 15 - 19, 2001.

If any additional information is needed, please do not hesitate to contact me.

ITINERARY ONLY: NOT VALID FOR TRANSPORTATION
CHIOUSANO/JULIUS PAGE 1 OF 1 FILE#
THIS ITINERARY IS FOR INFORMATION ONLY. Airfares are NOT guaranteed UNTIL ticketed. Seat assignments are subject to availability. Reconfirm reservations 72hrs prior to each flight.

TRANS WORLD AIRLINES FLIGHT 936 15FEB THU
DEPART 1018A FT LAUDERDALE
ARRIVE 0135P SAN JUAN PR
TRANS WORLD AIRLINES FLIGHT 917 19FEB MON
DEPART 0555F SAN JUAN PR
ARRIVE 0749P FT LAUDERDALE

CHECK-IN REQUIRED
MEALS: SNACK

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